

Michael R. Brooks
Nevada Bar No. 007287
HUTCHISON & STEFFEN, PLLC
Peccole Professional Park
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145
Tel: 702.385.2500 | Fax: 702.385.2086
E-mail: mbrooks@hutchlegal.com

Michael B. Bernacchi (*Specially Appearing*)
California Bar No. 163657
Nancy Jerian Marr (*Pro Hac Vice*)
California Bar No. 143248
BURKE, WILLIAMS & SORENSEN, LLP
444 South Flower Street, Suite 2400
Los Angeles, CA 90071-2953
Tel: 213.236.0600 | Fax: 213.236.2700
E-mail: mbernacchi@bwslaw.com; nmarr@bwslaw.com

Attorneys for Defendant
Hartford Life and Accident Insurance Company

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SONDRA WILLIAMSON,
Plaintiff,

v.

HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY, as Claims
Administrator for the Bank of America
Long-Term Disability Plan,

Defendant.

Case No. 2:23-cv-00485-APG-NJK

**ORDER
FOR ADDITIONAL EXTENSION OF
TIME FOR DEFENDANT HARTFORD
LIFE AND ACCIDENT INSURANCE
COMPANY TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

[Second Request]

Plaintiff Sondra Williamson ("Plaintiff"), through her counsel, Julie A. Mersch of the Law Office of Julie A. Mersch, and Defendant Hartford Life and Accident Insurance Company ("Hartford"), through its counsel, Michael B. Bernacchi and Nancy J. Marr of the law firm of Burke, Williams & Sorensen, LLP, hereby respectfully submit this second Stipulation, Request and Order for Additional Extension of Time to Answer or Otherwise Respond to Plaintiff's

1 Complaint (the “Stipulation”). This Stipulation is made in accordance with LR IA 6-1, LR IA 6-2,
2 and LR 7-1 of the Local Rules of this Court. This is the second request for an extension of time
3 for Hartford to file an answer or otherwise respond to Plaintiff’s Complaint.

4 Hartford was served with Plaintiff’s Complaint on April 10, 2023, making its responsive
5 pleading due on or before May 1, 2023. The parties stipulated to, and the Court granted, an
6 extension of time for Hartford to respond to the Complaint to May 22. This second extension is
7 requested as Hartford’s counsel requires additional time for the following reasons: Hartford’s
8 counsel only became aware on April 28, 2023 that the company was served with the Complaint
9 on April 10, 2023. Hartford’s counsel recently associated local counsel and submitted a *pro hac*
10 *vice* application on May 16, 2023, which the Court approved on May 17, 2023. Additional time is
11 required, in order to prepare a responsive pleading to Plaintiff’s Complaint, which may take some
12 time given the complexity of the file.

13 Upon agreement by and between all the parties hereto as set forth herein, the undersigned
14 respectfully requests this Court grant an additional two-week extension of time, up to and
15 including June 5, 2023, for Hartford to file an answer or otherwise respond to Plaintiff’s

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1 Complaint. By entering into this Stipulation, none of the parties waive any rights they have under
2 statute, law, or rule with respect to Plaintiff's Complaint.

3 DATED this 17th day of May, 2023.

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5 LAW OFFICE OF JULIE A. MERSCH
6 Julie A. Mersch

HUTCHISON & STEFFEN, PLLC
Michael R. Brooks

7 By: /s/ Julie A. Mersch
8 Julie A. Mersch
9 1100 East Bridger Avenue
10 Las Vegas, NV 89101
11 Attorney for Plaintiff
12 Sondra Williamson

BURKE, WILLIAMS & SORENSEN, LLP
Michael B. Bernacchi
Nancy Jerian Marr

By: /s/ Michael B. Bernacchi
Michael B. Bernacchi
444 South Flower Street, Suite 2400
Los Angeles, CA 90071-2953
Specially Appearing as Attorneys for Defendant
Hartford Life And Accident Insurance Company

13 **ORDER**

14 IT IS SO ORDERED:

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: May 18, 2023
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